

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ADREA, LLC,	)	
	)	
Plaintiff,	)	
	)	
- against -	)	ECF Case
	)	
BARNES & NOBLE, INC.,	)	13-CV-4137 (JSR)
BARNESANDNOBLE.COM LLC, and	)	
NOOK MEDIA LLC,	)	
	)	
Defendants.	)	
	)	
	)	

**DECLARATION OF YUE-HAN CHOW IN SUPPORT OF  
DEFENDANTS' OPPOSITON TO PLAINTIFF'S SUPPLEMENTAL BRIEF ON  
DAMAGES AND THE APPLICABILITY OF 35 U.S.C. § 287**

I, Yue-Han Chow, declare as follows:

1. I am a member of the Bar of the State of New York and an associate at the law firm of Arnold & Porter LLP, attorneys for Defendants and Counterclaim-Plaintiffs Barnes & Noble, Inc., barnesandnoble.com llc, and NOOK Media LLC (collectively, "Defendants" or "B&N").
  
2. I make this Declaration in Support of Defendants' Opposition to Plaintiff's Suppelmental Brief on Damages and the Applicability of 35 U.S.C. § 287.
  
3. Attached hereto as Exhibit A is a true and correct copy of excerpts from the trial transcript of this case.
  
4. Attached hereto as Exhibit B is a true and correct copy of a letter from Colin Cabral to Louis Ederer, dated October 4, 2014.

5. Attached hereto as Exhibit C is a true and correct copy of an email from Yue-Han Chow to the Court dated October 17, 2014.

6. Attached hereto as Exhibit D is a true and correct copy of an email from Yue-Han Chow to the Court dated October 20, 2014 and sent at 7:44 pm.

7. Attached hereto as Exhibit E is a true and correct copy of an email from Colin Cabral to the Court dated October 20, 2014 and sent at 9:16 pm.

8. Attached hereto as Exhibit F is a true and correct copy of an email from Yue-Han Chow to the Court dated October 20, 2014 and sent at 11:05 pm.

9. Attached hereto as Exhibit G is a true and correct copy of an email from the Court to the parties dated October 21, 2014 and sent at 9:04 am.

10. Attached hereto as Exhibit H is a true and correct copy of an email from Colin Cabral to the Court dated October 21, 2014 and sent at 7:30 pm.

11. Attached hereto as Exhibit I is a true and correct copy of an email from Yue-Han Chow to the Court dated October 21, 2014 and sent at 8:02 pm.

12. Attached hereto as Exhibit J is a true and correct copy of an email from the Court to the parties dated October 21, 2014 and sent at 8:50 pm.

13. Attached hereto as Exhibit K, under seal pursuant to the Protective Order, is a true and correct copy of a document entitled "Patent Cross-License Agreement among Discovery Communications, Inc., Discovery Patent Holdings, LLC, and Sony Corporation," marked as JTX 033, bearing production numbers ADREA0007485 - ADREA0007516.

14. Attached hereto as Exhibit L is a true and correct copy of an email dated October 19, 2014 from Yue-Han Chow to Colin Cabral, Brendan Cox, and others.

15. Attached hereto as Exhibit M, under seal pursuant to the Protective Order, is a true and correct copy of a document entitled "Discovery Communications E-Reader Market Update," marked as DTX 628, bearing production numbers DISCDE0000398298 - DISCDE0000398303.

16. Attached hereto as Exhibit N, under seal pursuant to the Protective Order, is a true and correct copy of excerpts from the deposition of James Rosenstock.

17. Attached hereto as Exhibit O, under seal pursuant to the Protective Order, is a true and correct copy of an email from Jay Rosenstock to Bruce Campbell, Joseph LaSala, and Emily Waldorf, marked as DTX 631, bearing production number DISCDE0000398335.

18. Attached hereto as Exhibit P, under seal pursuant to the Protective Order, is a true and correct copy of an email from Jay Rosenstock to Talal Shamoon, marked as DTX 649, bearing production number DISCDE0000443133.

19. Attached hereto as Exhibit Q, under seal pursuant to the Protective Order, is a true and correct copy of an email from Jay Rosenstock to Talal Shamoon, marked as DTX 650, bearing production number DISCDE0000443142.

20. Attached hereto as Exhibit R is a true and correct copy of a document entitled "Patent License and Settlement Agreement," marked as JTX 032, bearing production numbers ADREA0007435 - ADREA0007465.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 14, 2014, in New York, NY.

  
\_\_\_\_\_  
Yue-Han Chow

**CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2014, copies of the Declaration of Yue-Han Chow in Support of Defendants' Opposition to Plaintiff's Supplemental Brief on Damages and the Applicability of 35 U.S.C. § 287, with exhibits, were caused to be served upon the following via electronic mail and ECF:

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Yue-Han Chow